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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

JOHN DOE,  
 Plaintiff,  
 v.

DONALD J. TRUMP, in his official capacity as  
 President of the United States of America, *et al.*,  
 Defendants

S.Y., *et al.*,  
 Plaintiff,  
 v.

KRISTI NOEM, in her official capacity as  
 Secretary of the United States Department of  
 Homeland Security, *et al.*,  
 Defendants

ZHOUER CHEN, *et al.*  
 Plaintiff,  
 v.

) Case No. 25-03140 JSW  
 ) ORDER GRANTING AS MODIFIED  
 ) **STIPULATION TO EXTEND TIME TO ALLOW**  
 ) **THE PARTIES TO ENGAGE IN**  
 ) **NEGOTIATIONS FOR A POTENTIAL**  
 ) **RESOLUTION; ~~PROPOSED~~ ORDER**

) Case No. 4:25-cv-3244-JSW

) Case No. 4: 25-cv-3292-JSW

STIPULATION  
 4:25-CV-03140 JSW and related cases

1 KRISTI NOEM, *et al.*,

2 Defendants

4 SHANGSHANG WANG,

6 Plaintiff,

7 v.

8 KRISTI NOEM, *et al.*,

9 Defendants

11 JUNGWON KIM, *et al.*,

12 Plaintiff,

13 v.

14 KRISTI NOEM, *et al.*,

15 Defendants

16 W.B.

17 Plaintiff,

18 v.

19 KRISTI NOEM, *et al.*,

20 Defendants

23 SKY QUI,

24 Plaintiff,

25 v.

26 TODD M. LYONS, in his official capacity as  
27 Acting Director of United States Immigration and  
Customs Enforcement,

28 Defendant.

Case No. 4:25-cv-3323-JSW

Case No. 4:25-cv-3383-JSW

Case No. 4:25-cv-3407-JSW

Case No. 4:25-cv-3475-JSW

STIPULATION

4:25-CV-03140 JSW and related cases

EMMA BAI,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants

Case No. 4:25-cv-3481-JSW

J.C. *et al.*,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3502-JSW

ARYAN SHAH, *et al.*,

Plaintiff,

v.

TODD M. LYONS,

Defendant.

Case No. 4:25-cv-3549-JSW

YIWEI HE,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3480 JSC

On May 6, 2025, the Court granted the parties stipulation to an extension of time for Defendants' supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the deadline for Defendants' opposition on May 7, 2025, at 5:00 p.m. *See* Dkt. No. 55. The Court noted that "[t]here shall be no further extensions." *Id.*

Following the Court's order, Plaintiffs and Defendants have been actively engaged in negotiations for a potential resolution of these cases. The parties are negotiating in good faith but will need a brief period of additional time to determine if they can reach an agreement. Accordingly, the parties respectfully request the Court to grant an extension of time for Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' opposition to May 8, 2025, at 5:00 p.m. The parties are mindful of the Court's order and make this request because they believe it will benefit the parties and conserve the Court's resources to allow a brief period of additional time for the parties to pursue a potential resolution.

For *He v. Noem*, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for their joint status report to May 8, 2025. The parties respectfully request that the Court grant their stipulation.

Dated: May 7, 2025

Respectfully submitted,

PATRICK D. ROBBINS  
Acting United States Attorney

*s/ Elizabeth D Kurlan*  
ELIZABETH D. KURLAN  
Assistant United States Attorney

*Attorneys for Defendants*

Dated: May 7, 2025

*s/ John Nicholas Sinodis*  
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*Attorney for Plaintiff*

s/ Zachary R. New  
ZACHARY R. NEW  
Joseph and Hall P.C.

*Attorney for Plaintiff*

~~[PROPOSED]~~ ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental opposition to Plaintiffs' motion for preliminary injunction by May 8, 2025, at 5:00 p.m. If the parties are not able to resolve these matters, the Court reserves the right to continue the hearing to May 14, 2025 at 10:00 a.m. The Court reminds the parties that the cases have not been consolidated. Defendants shall file this stipulation in each case. Finally, if the parties require any further extensions, Defendants shall be prepared to state whether they will consent to extend the TROs until the motions for the preliminary injunctions are resolved.

May 7, 2025

JEFFREY S. WHITE  
United States District Judge

